

DONALD A. BAILEY

Attorney at Law
1601 Fifth Avenue, Suite 610
Seattle, Washington 98101

Telephone: (206) 910 2384
Donald.Bailey@shaferbailey.com

December 27, 2019

Hon Christopher M Alston
United States Bankruptcy Court
Western District of Washington

VIA ECF

Re: El-Moslimany Case No. 18-14820

Dear Judge Alston:

At the hearing on the debtor's motion to avoid the judgment lien of Hayat Sindi on November 22, 2019, the Court asked the parties to advise the Court how they thought the lien avoidance motion ought to proceed. This letter has been approved by Mr. Anthony Wisen, counsel for Hayat Sindi.

On December 19, 2019, the debtor and the trustee mediated their disputes involving the debtor's motion to compel abandonment of the debtor's residence, and the trustee's adversary action against Aziza Al-Yousef. The mediator was John Rizzardi. The debtor and the trustee reached a global settlement of all contested issues in this bankruptcy case, including 1) the abandonment motion (Docket # 81); 2) the lien avoidance motion (Docket #80), 3) the Al-Yousef adversary proceeding (Adv. Proc. # 19-01116); 4) the Hayat Sindi objection to the debtor's discharge (Adv. Proc. # 19-01034); and 5) the claims filed by the debtor's ex-spouse and sons (Claims # 6, 7 and 8). The settlement would also clear the way for Washington Federal Savings Bank to be granted relief from stay (Docket # 69).

Ms. Moewes and I are working on a settlement agreement. However, the settlement requires the consent of Hayat Sindi and the debtor's related claimants.

We are hopeful such consents will be forthcoming, potentially before the next scheduled hearing on January 3, 2020. However, in the event that a resolution has not been reached and is ready to submit for Court approval at that time, and the Court wishes to determine how the lien avoidance issues should go forward in the meantime, Ms. El-Moslimany believes the proper vehicle for resolution of the lien avoidance issues is the Al-Yousef adversary proceeding, where the issue of the validity and extent of the Al-Yousef deed of trust is already pending. Ms. Sindi believes the lien avoidance issues should be litigated by way of a counter-claim in the Hayat Sindi objection to discharge

December 27, 2019
page - 2

action.

Very truly yours,

A handwritten signature in black ink, appearing to read "Donald A. Bailey". The signature is stylized with a large, looped "D" and "B".

Donald A Bailey

cc: ECF Recipients